

Kirstin M. Jahn
Nevada Bar No. 6000
JAHN & ASSOCIATES, LLC
1942 Broadway Suite 314
Boulder, CO 80302
(303) 545-5128
Kirstin@jahnlaw.com

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

DINESH PATEL, an individual,
Plaintiff,

v

PAL USA, Inc., a Nevada corporation
Defendant.

Case No.: 2:24-cv-00536-APG-EJY

**UNOPPOSED MOTION FOR
EXTENSION OF TIME FOR
DEFENDANT TO FILE RESPONSE TO
COMPLAINT (SECOND REQUEST)
AND TO SCHEDULING ORDER**

Defendant Pal USA, Inc. ("Defendant") conferred with Plaintiff over the weekend pursuant to this Court's February 14, 2025 and Plaintiff agreed to allow Defendant a 30-day extension of time to file its answer to the complaint so long as the scheduling order deadlines are also moved out by 30 days. In light of this discussion and with plaintiff's consent, Defendant seeks a 30-day extension of time to respond to the Complaint, up through and including March 17, 2025, in addition to an extension of 30 days to the scheduling order due dates.

Defendant has good reason for seeking this extension because Defendant's attorney, Ms. Jahn, is recovering from shoulder replacement surgery, has had complications caused by the surgery, and is not yet working full time. In addition, she is working with only one arm so work tasks take quite a bit longer than they otherwise would take.

Thus, Defendant also seeks a 30-day extension of time to all dates set forth in the scheduling order to accommodate Defendant's extension of time to answer the Complaint.

The new proposed dates are as follows:

Event	Current Dates	Proposed New Dates
Deadline to Amend Pleadings	April 15, 2025	May 15, 2025
Close of Fact Discovery	July 15, 2025	August 15, 2025
Expert Reports Due	May 15, 2025	June 16, 2025
Rebuttal Expert Reports Due	June 16, 2025	July 16, 2025
Close of Expert Discovery	July 15, 2025	August 15, 2025
Deadline to File Dispositive Motions	September 15, 2025	October 15, 2025
Pretrial Conference Order unless dispositive motions are filed. If dispositive motions are filed the 30 days after the order issues relating to all dispositive motions.	October 15, 2025	November 14, 2025

For the foregoing reasons, Defendant respectfully requests this Court grant its motion for a 30-day extension of time to file a response to the complaint, up through and including March 15, 2025, and in addition, allow the parties a 30-day extension to the scheduling order as proposed above.

Dated: February 15, 2025

JAHN & ASSOCIATES

s/Kirstin M. Jahn
Attorneys for Defendant

IT IS SO ORDERED.


U.S. MAGISTRATE JUDGE

Henry E. Lichtenberger
SKLAR WILLIAMS PLLC
410 South Rampart Boulevard,
Suite 350,
Las Vegas, Nevada 89145

Date: February 18, 2025

*Defendants' Designated Attorney
for Service in Nevada LR 1A 11-1(b)(2)*